



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

LAND, CHEMICAL &
REDEVELOPMENT
DIVISION

April 13, 2020

Mr. Jason Evens
General Manager
US Ecology Idaho
20400 Lemley Road
Grand View, Idaho 83624

Re: Polychlorinated Biphenyl Processing Building and Update to Renew the Approval for Disposal and Commercial Storage of PCB Wastes
US Ecology Idaho, Inc. Grand View, Idaho
Environmental Protection Agency ID No. IDD073114654

Dear Mr. Evens:

The U.S. Environmental Protection Agency understands that the November 17, 2018 explosion in the US Ecology Idaho Containment Building damaged the PCB Processing Building. During a high wind event on January 21, 2019 a wall and the roof of the damaged PCB Processing Building collapsed. The roof and wall were moved to determine that staged TSCA waste containers were undamaged. After the undamaged TSCA waste containers were removed and loaded into van haul trailers for eventual off-site transport, the roof and all walls were pushed into the footprint of the building. USEI covered the debris with tarps to prevent infiltration by rain. According to a telephone conversation with Rebecca Hogaboam, USEI did sample the little bit of water in the building sump and there were only minimal PCBs detected. Based on these results Ms. Hogaboam indicated that USEI is not concerned about rain contact.

Appendix 6 of the Approval for Disposal and Commercial Storage of Polychlorinated Biphenyl (PCB) Wastes (Approval) contains the closure plan. The closure plan requires the building to be cleaned prior to re-use, or dismantled and disposed of in a PCB landfill cell. During a telephone conversation, Ms. Hogaboam indicated that past practice for the building when there were spills was immediate solvent cleanup of the spills. Debris from the collapsed PCB Processing Building were subsequently disposed of in a PCB landfill unit, leaving just the riveted steel floor/foundation in place.

The EPA has not seen the results of sump testing. Since the building was not cleaned prior to collapse, debris remained on the floor prior to landfill disposal, and the floor remains in place, there is potential that PCBs may have been on the debris and/or floor which may have migrated to the surrounding soils. To determine if any unreasonable risk of injury to health or the environment exists from PCBs, the EPA requires documentation of the partial closure activities, including the results for the sump water and any information showing that the remaining steel floor is not a source of PCBs- this can include representative samples demonstrating that the decontamination standards of 40 CFR 761.79(b) have been met, or demonstration of compliance with the self-implementing decontamination procedures found in 40 CFR 761.79(c).

Because PCBs are known to be hydrophobic, sampling sump water may not be wholly representative of PCB concentrations in the sump. The EPA requires PCB analysis for any solid material accumulated in the building sump. The EPA is also concerned that following the explosion the sump may not have been

effective in directing the flow of water and any entrained contamination to the sump, rather than outside the footprint of the steel floor. Therefore, the EPA requires USEI to conduct soil sampling around the perimeter of the building footprint. Please provide a soil sampling plan for my review within 60 days of receipt of this letter.

The EPA understands that USEI would like to retain the ability to reconstruct the PCB Processing Building at a later date. The EPA expects USEI to either reconstruct the building or complete final closure steps for the remaining floor/foundation. To this end EPA requests that USEI report to the EPA by June 30, 2020 whether the PCB Processing Building will be reconstructed or go through final closure. If USEI needs more time to make this decision, USEI must ask the EPA for a different date to report their decision. This date is only for making a decision about how to proceed, not a completion date for completing closure or rebuilding plans.

If the building will not be reconstructed, the EPA would like to see the safe recycling of the steel floor as opposed to disposal into a PCB landfill cell. Decontamination under the appropriate provisions of 40 C.F.R. § 761.79 would allow for unrestricted recycling of the steel.

Prior to the explosion, USEI was collaborating with the EPA on submission of an updated renewal application for commercial storage and disposal of PCB wastes. We understand USEI is working with IDEQ to rebuild the hazardous waste treatment building and return Landfill Cell 15 to full RCRA disposal use subsequent to the December 28, 2019 cell fire. The EPA expects that USEI will be ready to resume collaboration with the EPA on finalizing the update to the renewal application by July 6, 2020. The due date for submitting the updated TSCA renewal application is October 9, 2020.

Please contact me at (206) 553-4323 if there are any questions regarding this letter. Any request for extension to a due date established in this letter must be requested via email at castrilli.laura@epa.gov.

Sincerely,

Laura Castrilli
RCRA Corrective Action, Permits and PCB Section

cc: Mr. Brian English, IDEQ
Mr. Daryl Sawyer, IDEQ
Ms. Rebecca Hogaboam, USEI